

D. GEORGE SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
(FOLEY SQUARE)

D. GEORGE SWEIGERT

Case No.: 1:18-cv-08653-UA

Plaintiff,

vs.

JURY TRIAL DEMANDED

JASON GOODMAN

And

PLAINTIFF'S MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT PER FRCP
15(A)

PATREON, INC. (proposed)

Defendants

USDC SDNY
DOCUMENT
FILED ELECTRONICALLY
DOC # 10-17-18

NOW COMES THE PRO SE plaintiff, a layman non-attorney who is acting in the capacity of private attorney general in a public interest lawsuit, to respectfully request this Court grant **PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT PER FRCP 15(a)** ("The court should freely give leave when justice so requires.").

For the reasons and rationale expressed in the accompanying MEMORANDUM POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT PER FRCP 15(a) the Court should approve this motion and ORDER that the proposed Second Amended Complaint become the operative complaint for this litigation.

The proposed Second Amended Complaint, filed contemporaneously with this pleading, refines the scope of issues created by the Change of Venue as articulated in the decision of the U.S. District Judge (Doc. No. 27, 09/17/2018) and the recommendation of the U.S. Magistrate (Doc. No. 22, 08/29/2018). Almost four (4) months

1 have passed since the filing of the operative Amended Complaint in South Carolina (Doc. No. 5, filed 06/29/2018
2 [herein the AC]. Circumstances have changed which require a more current complaint.

3
4 Additionally, as New York State has published its own racketeering law, **New York Penal Law - PEN §**
5 **460.00**, and South Carolina does not have such a law, legal deficiencies of the AC require correction.

6 The Plaintiff also seeks permission of the Court to add PATREON, INC., a California corporation, as a co-
7 defendant. Therefore, the Plaintiff relies on F.R.C.P. Rule 21 to seek joinder of parties (PATREON, Inc.).

8 Dated this day of October 12, 2018
9

10 Respectfully submitted.

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13 D. GEORGE SWEIGERT
14 Pro se non-attorney acting as a private attorney general
15 for this public interest lawsuit
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CERTIFICATE OF SERVICE

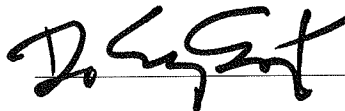
CERTIFICATE OF SERVICE

The Plaintiff certifies under penalties of perjury that the enclosed documents have been sent via First Class
postage paid U.S. Mail to:

Jason Goodman
252 7th Avenue #6S
New York, NY 10001

PRO SE DIVISION
Clerk of the Court
U.S. District Court for the SDNY
(FOLEY SQUARE)
500 Pearl Street
New York, New York 10007-1312

Respectfully dated this day 12 October, 2018,



D. GEORGE SWEIGERT

CERTIFICATE OF SERVICE